

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

THE DUTRA GROUP,  
  
Plaintiff,

v.

NATIONAL LABOR RELATIONS BOARD, a  
federal administrative agency, WILLIAM B.  
COWEN, in his official capacity as the Acting  
General Counsel of the National Labor Relations  
Board, MARVIN E. KAPLAN, in his official  
capacity as the Chairman of the National Labor  
Relations Board, DAVID M. PROUTY, in his official  
capacity as Board Members of the National Labor  
Relations Board, JILL H. COFFMAN, in her official  
capacity as a Regional Director for the National  
Labor Relations Board, and JOHN DOE in his  
official capacity as an Administrative Law Judge of  
the National Labor Relations Board,

Defendants.

Civil Action No. 1:25-cv-00090

**CERTIFICATE OF SERVICE**

I certify that on February 26, 2025, I electronically filed a Complaint and Emergency Motion for Temporary Restraining Order and/or Preliminary Injunction with the court and also served it via U.S. Mail express delivery to the persons listed below:

National Labor Relations Board  
c/o William B. Cowen,  
Acting General Counsel of the National Labor Relations Board  
1015 Half Street SE  
Washington, D.C. 20570-0001

William B. Cowen,  
in his official capacity as Acting General Counsel of the National Labor Relations Board  
1015 Half Street SE Washington, D.C. 20570-0001  
Marvin E. Kaplan,

in his official capacity as a Chairman of the National Labor Relations Board  
1015 Half Street SE Washington, D.C. 20570-0001

David M. Prouty,  
in his official capacity as a Board Member of the National Labor Relations Board  
1015 Half Street SE Washington, D.C. 20570-0001

Jill H. Coffman,  
in her official capacity as a Regional Director of the National Labor Relations Board  
Regional Office 20  
450 Golden Gate Ave.  
3rd Floor, Suite 3112  
San Francisco, CA 94102

**BLANK ROME LLP**

/s/ Audrey F. Momanaee

Audrey F. Momanaee  
Texas Bar No. 24055993  
717 Texas Avenue, Suite 1400  
Houston, TX 77002  
Tel. 713-632-8613  
audrey.momanaee@blankrome.com

Andrew I. Herman, Esquire  
Pennsylvania Bar No. 317094  
(*pro hac vice* motion forthcoming)  
One Logan Square  
130 North 18th Street  
Philadelphia, PA 19103-6998  
Tel. 215-569-5574  
Fax. 215-832-5822  
andrew.herman@blankrome.com

**Attorneys for Plaintiff  
The Dutra Group**